

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
MALLINCKRODT PLC,) Case No. 20-_____ (____)
Debtor.)
<u>Tax I.D. No. 98-1088325</u>)
In re:) Chapter 11
ACTHAR IP UNLIMITED COMPANY,) Case No. 20-_____ (____)
Debtor.)
<u>Tax I.D. No. 98-1219747</u>)
In re:) Chapter 11
IMC EXPLORATION COMPANY,) Case No. 20-_____ (____)
Debtor.)
<u>Tax I.D. No. 74-1856768</u>)
In re:) Chapter 11
INFACARE PHARMACEUTICAL) Case No. 20-_____ (____)
CORPORATION,)
Debtor.)
<u>Tax I.D. No. 31-1807488</u>)
In re:) Chapter 11
INO THERAPEUTICS LLC,) Case No. 20-_____ (____)
Debtor.)
<u>Tax I.D. No. 47-0931456</u>)

In re:) Chapter 11
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LUDLOW LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 04-2614539)
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MAK LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 82-3297479)
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Tax I.D. No. 47-2085115)
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MALLINCKRODT ARD FINANCE LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 82-3638933)
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In re:) Chapter 11
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MALLINCKRODT ARD HOLDINGS INC.,) Case No. 20-_____ (_____
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Tax I.D. No. 47-2402827)

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In re:) Chapter 11
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MALLINCKRODT ARD HOLDINGS LIMITED,) Case No. 20-_____ (_____
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Tax I.D. No. 98-1190042)
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In re:) Chapter 11
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MALLINCKRODT ARD IP UNLIMITED) Case No. 20-_____ (_____
COMPANY,)
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Debtor.)
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Tax I.D. No. 98-1273238)
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In re:) Chapter 11
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MALLINCKRODT ARD LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 33-0476164)
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In re:) Chapter 11
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MALLINCKRODT BRAND) Case No. 20-_____ (_____
PHARMACEUTICALS LLC,)
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Debtor.)
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Tax I.D. No. 90-0136080)
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In re:) Chapter 11
)
MALLINCKRODT BUCKINGHAM UNLIMITED) Case No. 20-_____ (_____
COMPANY,)
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Debtor.)
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United Kingdom Tax I.D. No. 7891923224)

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In re:) Chapter 11
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Tax I.D. No. 83-1878651)
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In re:) Chapter 11
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MALLINCKRODT CRITICAL CARE FINANCE) Case No. 20-_____ (_____
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Debtor.)
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Tax I.D. No. 47-5172425)
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In re:) Chapter 11
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MALLINCKRODT ENTERPRISES HOLDINGS,) Case No. 20-_____ (_____
INC.,)
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Debtor.)
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Tax I.D. No. 94-3160456)
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In re:) Chapter 11
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MALLINCKRODT ENTERPRISES LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 36-4679061)

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MALLINCKRODT ENTERPRISES UK LIMITED,) Case No. 20-_____ (_____
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Tax I.D. No. 98-1190911)
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MALLINCKRODT EQUINOX FINANCE LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 32-0542730)
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In re:) Chapter 11
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MALLINCKRODT GROUP S.À R.L.,) Case No. 20-_____ (_____
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Tax I.D. No. 98-1094611)
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In re:) Chapter 11
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MALLINCKRODT HOLDINGS GMBH,) Case No. 20-_____ (_____
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MALLINCKRODT HOSPITAL PRODUCTS INC.,) Case No. 20-_____ (_____
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Debtor.)
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Tax I.D. No. 41-2142317)

)
In re:) Chapter 11
)
MALLINCKRODT HOSPITAL PRODUCTS IP) Case No. 20-_____ (_____
UNLIMITED COMPANY,)
)
Debtor.)
)
Tax I.D. No. 98-1273300)
)
In re:) Chapter 11
)
MALLINCKRODT INTERNATIONAL FINANCE) Case No. 20-_____ (_____
SA,)
)
Debtor.)
)
Tax I.D. No. 98-1094609)
)
In re:) Chapter 11
)
MALLINCKRODT INTERNATIONAL) Case No. 20-_____ (_____
HOLDINGS S.À R.L.,)
)
Debtor.)
)
Tax I.D. No. 98-1272203)
)
In re:) Chapter 11
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MALLINCKRODT IP UNLIMITED COMPANY,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 98-1190770)
)
In re:) Chapter 11
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MALLINCKRODT LLC,) Case No. 20-_____ (_____
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Debtor.)
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Tax I.D. No. 43-1479062)

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In re:) Chapter 11
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MALLINCKRODT LUX IP S.À R.L.,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 98-1190722)
)
In re:) Chapter 11
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MALLINCKRODT MANUFACTURING LLC,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 47-5172075)
)
In re:) Chapter 11
)
MALLINCKRODT PHARMA IP TRADING) Case No. 20-_____ (_____
UNLIMITED COMPANY,)
)
Debtor.)
)
Tax I.D. No. 98-1272335)
)
In re:) Chapter 11
)
MALLINCKRODT PHARMACEUTICALS) Case No. 20-_____ (_____
IRELAND LIMITED,)
)
Debtor.)
)
Tax I.D. No. 98-1217693)
)
In re:) Chapter 11
)
MALLINCKRODT PHARMACEUTICALS) Case No. 20-_____ (_____
LIMITED,)
)
Debtor.)
)
Tax I.D. No. 98-1274182)

In re:) Chapter 11
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MALLINCKRODT QUINCY S.À R.L.,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 98-1191395)
)
In re:) Chapter 11
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MALLINCKRODT UK FINANCE LLP,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 98-1274193)
)
In re:) Chapter 11
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MALLINCKRODT UK LTD,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 98-1240542)
)
In re:) Chapter 11
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MALLINCKRODT US HOLDINGS LLC,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 32-0408865)
)
In re:) Chapter 11
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MALLINCKRODT US POOL LLC,) Case No. 20-_____ (_____
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Debtor.)
)
Tax I.D. No. 90-0937192)

)
In re:) Chapter 11
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MALLINCKRODT VETERINARY, INC.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 36-3480465)
)
In re:) Chapter 11
)
MALLINCKRODT WINDSOR IRELAND) Case No. 20-_____ (_____
FINANCE UNLIMITED COMPANY,)
)
Debtor.)
)
Ireland Tax I.D. No. 3347922OH)
)
In re:) Chapter 11
)
MALLINCKRODT WINDSOR S.À R.L.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1286736)
)
In re:) Chapter 11
)
MCCH LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 32-0541022)
)
In re:) Chapter 11
)
MEH, INC.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 65-0952696)

In re:))	Chapter 11
MHP FINANCE LLC,))	Case No. 20-_____ (____)
Debtor.)))
<u>Tax I.D. No. 47-5176059</u>)))
In re:))	Chapter 11
MKG MEDICAL UK LTD,))	Case No. 20-_____ (____)
Debtor.)))
<u>Tax I.D. No. 98-1241288</u>)))
In re:))	Chapter 11
MNK 2011 LLC,))	Case No. 20-_____ (____)
Debtor.)))
<u>Tax I.D. No. 80-0739865</u>)))
In re:))	Chapter 11
MUSHI UK HOLDINGS LIMITED,))	Case No. 20-_____ (____)
Debtor.)))
<u>Tax I.D. No. 98-1190248</u>)))
In re:))	Chapter 11
OCERA THERAPEUTICS, INC.,))	Case No. 20-_____ (____)
Debtor.)))
<u>Tax I.D. No. 63-1192270</u>)))

In re:))	Chapter 11
PETTEN HOLDINGS INC.,))	Case No. 20-_____ (____)
Debtor.))	
<u>Tax I.D. No. 83-3441641</u>))	
In re:))	Chapter 11
SPECGX HOLDINGS LLC,))	Case No. 20-_____ (____)
Debtor.))	
<u>Tax I.D. No. 84-3594520</u>))	
In re:))	Chapter 11
SPECGX LLC,))	Case No. 20-_____ (____)
Debtor.))	
<u>Tax I.D. No. 81-4463153</u>))	
In re:))	Chapter 11
ST OPERATIONS LLC,))	Case No. 20-_____ (____)
Debtor.))	
<u>Tax I.D. No. 84-4597158</u>))	
In re:))	Chapter 11
ST SHARED SERVICES LLC,))	Case No. 20-_____ (____)
Debtor.))	
<u>Tax I.D. No. 84-3727053</u>))	

In re:) Chapter 11
ST US HOLDINGS LLC,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 20-5950462)
In re:) Chapter 11
ST US POOL LLC,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 84-4591199)
In re:) Chapter 11
STRATATECH CORPORATION,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 39-2025292)
In re:) Chapter 11
SUCAMPO HOLDINGS INC.,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 85-2745451)
In re:) Chapter 11
SUCAMPO PHARMA AMERICAS LLC,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 13-3929237)

In re:) Chapter 11
SUCAMPO PHARMACEUTICALS, INC.,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 30-0520478)
In re:) Chapter 11
THERAKOS, INC.,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 22-2575957)
In re:) Chapter 11
VTESSE LLC,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 47-1075596)
In re:) Chapter 11
WEBSTERGX HOLDCO LLC,) Case No. 20-_____ (_____
Debtor.)
Tax I.D. No. 85-0505835)

**MOTION OF DEBTORS FOR ORDER
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

The debtors in possession in the above-captioned cases (collectively, the “*Debtors*”) hereby move (this “*Motion*”) and respectfully state as follows:

RELIEF REQUESTED

1. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “***Proposed Order***”), directing the joint administration of their chapter 11 cases for procedural purposes only and granting related relief. No previous request for the relief sought herein has been made to this Court or any other court.

JURISDICTION

2. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and, under Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “***Bankruptcy Rules***”), and, under Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “***Local Rules***”), the Debtors consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution. Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409. The statutory and legal predicates for the relief requested herein are section 101(2) of the Bankruptcy Code (as defined below) and Bankruptcy Rule 1015(b).

BACKGROUND

3. On the date hereof (the “***Petition Date***”), the Debtors filed voluntary petitions in this Court commencing cases for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “***Bankruptcy Code***”). The Debtors continue to manage and operate their

businesses as debtors in possession under sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been requested in these cases, and no committees have been appointed.

4. The factual background regarding the Debtors, including their business operations, their capital and debt structures, and the events leading to the filing of these chapter 11 cases, is set forth in detail in the *Declaration of Stephen A. Welch, Chief Transformation Officer, in Support of Chapter 11 Petitions and First Day Motions* (the “**Welch Declaration**”) filed contemporaneously herewith, which is fully incorporated herein by reference.

JOINT ADMINISTRATION IS APPROPRIATE

5. The Debtors submit that their chapter 11 cases should be jointly administered for procedural purposes only. The Debtors that commenced these chapter 11 cases are “affiliates” as such term is defined in section 101(2) of the Bankruptcy Code. Between them, the Debtors operate two distinct businesses but with complementary strategies and operational roles, synergistic overhead sharing, and a shared focus on their corporate mission: to be an innovation-driven biopharmaceutical company focused on improving outcomes for underserved patients with severe and critical conditions.

6. Importantly, joint administration will ease the administrative burden on the Court and all parties in interest by, among other things, eliminating the need for duplicative pleadings, notices, and orders in each of the respective dockets and saving the Court, the Debtors, and other parties in interest substantial time and expense when preparing and filing such documents. Further, joint administration will protect parties in interest by ensuring that they will be apprised of the various motions filed with the Court with respect to each of the Debtors’ cases.

7. Accordingly, the Debtors submit, as reflected in the Proposed Order, that joint administration is appropriate and request that all parties be authorized to utilize the following,

simplified case caption for pleadings and notices in these chapter 11 cases:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)) Chapter 11
))
MALLINCKRODT PLC, <i>et al.</i> ,)) Case No. 20-_____ (____)
))
Debtors. ¹)) (Jointly Administered)
))
))

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <http://restructuring.primeclerk.com/Mallinckrodt>. The Debtors' mailing address is 675 McDonnell Blvd., Hazelwood, Missouri 63042.

BASIS FOR RELIEF

8. Bankruptcy Rule 1015(b) provides, in relevant part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” of each other as that term is defined in section 101(2) of the Bankruptcy Code. Specifically, Debtor Mallinckrodt plc directly or indirectly owns or controls twenty percent (20%) or more of the outstanding voting securities of each of the other Debtors as a direct or indirect parent. Operationally, the Debtors function in complementary respects within their respective business lines—Specialty Brands and Specialty Generics, each as defined and further described in the Welch Declaration—to run their businesses of developing and commercializing specialty biopharmaceutical products and manufacturing high-quality generic medicines. This Court, therefore, is authorized to consolidate the Debtors’ cases for procedural purposes.

9. The Welch Declaration establishes that joint administration is warranted here in view of the benefits it will afford to the Court, the Debtors, and all parties in interest. Further, joint administration will not adversely affect the Debtors’ respective constituencies because this

motion seeks only administrative combination, and not substantive consolidation of the Debtors' estates. Thus, the Debtors submit that joint administration of these chapter 11 cases is in the best interests of their estates, their creditors, and all parties in interest.

10. Finally, the Debtors submit that use of the simplified caption, without reference to the Debtors' tax identification numbers, addresses, and previous names, will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification. Other case-specific information will be listed in the petitions for the respective Debtors and such petitions are publicly available, including on the restructuring website maintained by the Debtors that is free to access, and will be provided by the Debtors upon request. Therefore, the Debtors submit the policies behind the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) have been fully satisfied.

11. For these reasons, the Debtors submit that the relief requested is necessary and appropriate, is in the best interest of their respective estates and creditors, and should be granted in all respects.

NOTICE

12. Notice of this Motion will be given to: (a) the Office of the United States Trustee for the District of Delaware; (b) counsel to the ad hoc group of the Debtors' prepetition secured lenders; (c) the agent under the Debtors' secured term and revolving financing facilities; (d) counsel to the ad hoc group of holders of the Debtors' unsecured notes; (e) the indenture trustees for the Debtors' outstanding notes; (f) counsel to the ad hoc committee of governmental entities holding opioid claims; (g) the parties included on the Debtors' consolidated list of fifty (50) largest unsecured creditors; (h) the United States Attorney's Office for the District of Delaware; (i) the attorneys general for all 50 states and the District of Columbia; (j) the United

States Department of Justice; (k) the Internal Revenue Service; (l) the Securities and Exchange Commission; (m) the United States Drug Enforcement Agency; (n) the United States Food and Drug Administration; and (o) all parties entitled to notice pursuant to Local Rule 9013-1(m). The Debtors submit that, under the circumstances, no other or further notice is required.

13. A copy of this Motion is available from (a) the Court's website, www.deb.uscourts.gov, and (b) the website maintained by the Debtors' proposed claims and noticing agent, Prime Clerk LLC, at <http://restructuring.primeclerk.com/Mallinckrodt>.

NO PRIOR MOTION

14. The Debtors have not made any prior motion for the relief sought in this Motion to this Court or any other court.

[Remainder of page intentionally left blank.]

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, granting the relief requested in this Motion and such other and further relief as may be just and proper.

Dated: October 12, 2020
Wilmington, DE

/s/ Mark D. Collins

RICHARDS, LAYTON & FINGER, P.A.

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Michael J. Merchant (No. 3854)
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Wilmington, DE 19801
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Email: collins@rlf.com
merchant@rlf.com
steele@rlf.com
schlauch@rlf.com

- and -

George A. Davis (*pro hac vice* pending)
George Klidonas (*pro hac vice* pending)
Andrew Sorkin (*pro hac vice* pending)
Anupama Yerramalli (*pro hac vice* pending)

LATHAM & WATKINS LLP

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New York, New York 10022
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anu.yerramalli@lw.com

- and -

Jeffrey E. Bjork (*pro hac vice* pending)

LATHAM & WATKINS LLP

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Los Angeles, California 90071
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Email: jeff.bjork@lw.com

- and -

Jason B. Gott (*pro hac vice* pending)

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767
Email: jason.gott@lw.com

Proposed Counsel for Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re:) Chapter 11
)
MALLINCKRODT PLC,) Case No. 20-_____ (_____
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INFACARE PHARMACEUTICAL) Case No. 20-_____ (_____
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Tax I.D. No. 31-1807488)
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In re:) Chapter 11
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INO THERAPEUTICS LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 47-0931456)

In re:) Chapter 11
LUDLOW LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 04-2614539)
In re:) Chapter 11
MAK LLC,) Case No. 20-_____ (_____
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Tax I.D. No. 82-3297479)
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MALLINCKRODT APAP LLC,) Case No. 20-_____ (_____
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MALLINCKRODT BRAND) Case No. 20-_____ (_____
PHARMACEUTICALS LLC,)
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Tax I.D. No. 90-0136080)
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MALLINCKRODT BUCKINGHAM UNLIMITED) Case No. 20-_____ (_____
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United Kingdom Tax I.D. No. 7891923224)

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Tax I.D. No. 36-4679061)

In re: _____)
) Chapter 11
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Debtor. _____)
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In re: _____) Chapter 11
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MALLINCKRODT EQUINOX FINANCE LLC, _____) Case No. 20-_____ (_____
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Debtor. _____)
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MALLINCKRODT GROUP S.À R.L., _____) Case No. 20-_____ (_____
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Debtor. _____)
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Tax I.D. No. 98-1162957 _____)
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In re: _____) Chapter 11
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MALLINCKRODT HOSPITAL PRODUCTS INC., _____) Case No. 20-_____ (_____
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Debtor. _____)
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Tax I.D. No. 41-2142317 _____)

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In re:) Chapter 11
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MALLINCKRODT HOSPITAL PRODUCTS IP) Case No. 20-_____ (_____
UNLIMITED COMPANY,)
)
Debtor.)
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Tax I.D. No. 98-1273300)
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In re:) Chapter 11
)
MALLINCKRODT INTERNATIONAL FINANCE) Case No. 20-_____ (_____
SA,)
)
Debtor.)
)
Tax I.D. No. 98-1094609)
)
In re:) Chapter 11
)
MALLINCKRODT INTERNATIONAL) Case No. 20-_____ (_____
HOLDINGS S.À R.L.,)
)
Debtor.)
)
Tax I.D. No. 98-1272203)
)
In re:) Chapter 11
)
MALLINCKRODT IP UNLIMITED COMPANY,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1190770)
)
In re:) Chapter 11
)
MALLINCKRODT LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 43-1479062)

)
In re:) Chapter 11
)
MALLINCKRODT LUX IP S.À R.L.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1190722)
)
In re:) Chapter 11
)
MALLINCKRODT MANUFACTURING LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 47-5172075)
)
In re:) Chapter 11
)
MALLINCKRODT PHARMA IP TRADING) Case No. 20-_____ (_____
UNLIMITED COMPANY,)
)
Debtor.)
)
Tax I.D. No. 98-1272335)
)
In re:) Chapter 11
)
MALLINCKRODT PHARMACEUTICALS) Case No. 20-_____ (_____
IRELAND LIMITED,)
)
Debtor.)
)
Tax I.D. No. 98-1217693)
)
In re:) Chapter 11
)
MALLINCKRODT PHARMACEUTICALS) Case No. 20-_____ (_____
LIMITED,)
)
Debtor.)
)
Tax I.D. No. 98-1274182)

In re:) Chapter 11
)
MALLINCKRODT QUINCY S.À R.L.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1191395)
)
In re:) Chapter 11
)
MALLINCKRODT UK FINANCE LLP,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1274193)
)
In re:) Chapter 11
)
MALLINCKRODT UK LTD,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1240542)
)
In re:) Chapter 11
)
MALLINCKRODT US HOLDINGS LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 32-0408865)
)
In re:) Chapter 11
)
MALLINCKRODT US POOL LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 90-0937192)

)
In re:) Chapter 11
)
MALLINCKRODT VETERINARY, INC.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 36-3480465)
)
In re:) Chapter 11
)
MALLINCKRODT WINDSOR IRELAND) Case No. 20-_____ (_____
FINANCE UNLIMITED COMPANY,)
)
Debtor.)
)
Ireland Tax I.D. No. 3347922OH)
)
In re:) Chapter 11
)
MALLINCKRODT WINDSOR S.À R.L.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 98-1286736)
)
In re:) Chapter 11
)
MCCH LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 32-0541022)
)
In re:) Chapter 11
)
MEH, INC.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 65-0952696)

In re: _____)
MHP FINANCE LLC, _____) Chapter 11
Debtor. _____)
Tax I.D. No. 47-5176059 _____)

In re: _____) Chapter 11
MKG MEDICAL UK LTD, _____) Case No. 20-_____ (_____
Debtor. _____)
Tax I.D. No. 98-1241288 _____)

In re: _____) Chapter 11
MNK 2011 LLC, _____) Case No. 20-_____ (_____
Debtor. _____)
Tax I.D. No. 80-0739865 _____)

In re: _____) Chapter 11
MUSHI UK HOLDINGS LIMITED, _____) Case No. 20-_____ (_____
Debtor. _____)
Tax I.D. No. 98-1190248 _____)

In re: _____) Chapter 11
OCERA THERAPEUTICS, INC., _____) Case No. 20-_____ (_____
Debtor. _____)
Tax I.D. No. 63-1192270 _____)

In re: _____)
PETTEN HOLDINGS INC., _____) Chapter 11
Debtor. _____)

Tax I.D. No. 83-3441641 _____)

In re: _____) Chapter 11
SPECGX HOLDINGS LLC, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 84-3594520 _____)

In re: _____) Chapter 11
SPECGX LLC, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 81-4463153 _____)

In re: _____) Chapter 11
ST OPERATIONS LLC, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 84-4597158 _____)

In re: _____) Chapter 11
ST SHARED SERVICES LLC, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 84-3727053 _____)

In re: _____)
ST US HOLDINGS LLC, _____) Chapter 11
Debtor. _____)

Tax I.D. No. 20-5950462 _____)

In re: _____) Chapter 11
ST US POOL LLC, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 84-4591199 _____)

In re: _____) Chapter 11
STRATATECH CORPORATION, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 39-2025292 _____)

In re: _____) Chapter 11
SUCAMPO HOLDINGS INC., _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 85-2745451 _____)

In re: _____) Chapter 11
SUCAMPO PHARMA AMERICAS LLC, _____) Case No. 20-_____ (_____
Debtor. _____)

Tax I.D. No. 13-3929237 _____)

In re:) Chapter 11
)
SUCAMPO PHARMACEUTICALS, INC.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 30-0520478)
)
In re:) Chapter 11
)
THERAKOS, INC.,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 22-2575957)
)
In re:) Chapter 11
)
VTESSE LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 47-1075596)
)
In re:) Chapter 11
)
WEBSTERGX HOLDCO LLC,) Case No. 20-_____ (_____
)
Debtor.)
)
Tax I.D. No. 85-0505835)

ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

Upon the motion (the “**Motion**”)¹ of the Debtors for an order directing the joint administration of the Debtors’ chapter 11 cases for procedural purposes only and granting certain related relief, all as more fully set forth in the Motion; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and the Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and a hearing having been held to consider the relief requested in the Motion (the “**Hearing**”); and upon the Welch Declaration and the record of the Hearing and all the proceedings before the Court; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. Each of the above-captioned chapter 11 cases of the Debtors are consolidated for procedural purposes only and shall be jointly administered by the Court under Case No. 20-[●] ().

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

3. Nothing contained in the Motion or this Order is to be deemed or construed as directing or otherwise effecting a substantive consolidation of these chapter 11 cases.

4. The caption of the jointly administered cases shall read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
MALLINCKRODT PLC, et al.,) Case No. 20-_____ (_____
Debtors.) (Jointly Administered)
)
)
)

5. All pleadings and notices shall be captioned as indicated in the preceding decretal paragraph, and all original docket entries shall be made in the case of Mallinckrodt plc, Case No. 20-[●]().

6. The following docket entry shall be made in the chapter 11 cases of the Debtors, other than Mallinckrodt plc:

An order has been entered in this case consolidating this case with the case of Mallinckrodt plc (Case No. 20-[●]()) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The docket in Case No. 20-[●]() should be consulted for all matters affecting this case.

7. The Debtors are directed to include the following footnote to each pleading they file and notice they mail in these chapter 11 cases:

A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <http://restructuring.primeclerk.com/Mallinckrodt>. The Debtors' mailing address is 675 McDonnell Blvd., Hazelwood, Missouri 63042.

8. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.